

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

SANDRA K. LISTEBARGER,

Plaintiff,

v.

FMA ALLIANCE, LTD.,

Defendant.

CASE NO: 4:22-cv-03111

**MOTION TO EXTEND TIME TO JOINT CASE MANAGEMENT PLAN**

NOW COMES SANDRA K. LISTEBARGER, ("Plaintiff"), by and through her undersigned counsel, moving this Honorable Court to extend the time for the parties to file their Case Management Plan pursuant this Court's Order dated September 13, 2022, [Dkt 6] and in support thereof, stating as follows:

1. On September 12, 2022, Plaintiff filed the instant action against Defendant. [Dkt. 1]
2. The following day, on September 13, 2022, Plaintiff caused a Summons to be issued as to the Defendant. [Dkt 8]
3. On the same day, September 13, 2022, this Court entered an Order requiring, among other things, that the parties are to file a case management plan pursuant to Fed. R. Civ P. Rule 26 (f) by October 4, 2022 (14 days prior to the Initial Pretrial Conference currently set for October 18, 2022. [Dkt 6]
4. On October 3, 2022, the Return of Service was filed evidencing the service of the Defendant on September 27, 2022, and its Answer being due on October 18, 2022. [Dkt 10]

5. In light of Defendant's Answer not being due until the day of the Court's Initial Pretrial Conference, Plaintiff is requesting an extension for the parties to submit their Case Management Plan.

6. The extension is sought in an effort to conserve resources and the extension will not prejudice any party and is sought in good faith.

7. Based on the foregoing, there is good cause to grant the brief extension sought herein.

WHEREFORE, Plaintiff respectfully requests that the Court enter an order extending the deadline for the parties to submit their Case Management Plan, and for any other relief this Court deems appropriate.

DATED: October 3, 2022

Respectfully submitted,

/s/ Marwan R. Dahir  
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*Counsel for Plaintiff*

#### **CERTIFICATE OF SERVICE**

I hereby certify that I today caused a copy of the foregoing document to be electronically filed with the Clerk of Court using the CM/ECF system which will be sent to all attorneys of record.

/s/ Marwan R. Dahir